#### MILBANK, TWEED, HADLEY & M<sup>c</sup>CLOY LLP

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## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re : Chapter 11

YOUNG BROADCASTING INC., et al., : Case No. 09-10645 (AJG)

Debtors. : (Jointly Administered)

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# OBJECTION OF WACHOVIA BANK, N.A., AGENT FOR SENIOR SECURED LENDERS, TO THE PLAN OF REORGANIZATION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS

Wachovia Bank, N.A. ("Wachovia"), the administrative agent for the senior secured lenders (the "Lenders") under the Credit Agreement dated as of May 3, 2005, with Young Broadcasting, Inc. ("YBI" or the "Company") and its subsidiaries (the "Debtors"), hereby objects to the confirmation of the Official Committee of Unsecured Creditors' (the "Committee") Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code (the "Committee Plan"). The bases for Wachovia's objection will be set forth in Wachovia's prehearing brief, which will be filed tomorrow, December 16, 2009 by 3 p.m. EST, as per the Court's authorization to extend the extend the filing date set in the November 6, 2009 Scheduling Order (Doc. No. 654). All the bases for Wachovia's objection will be set forth in the pre-hearing brief and are incorporated herein by reference.

Dated: December 15, 2009

### Respectfully submitted,

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#### By: /s/ Daniel Perry\_

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